

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Concerned Pastors for Social Action, et al.,
Plaintiffs,

Case No. 16-10277
Hon. David M. Lawson

v.

Nick A. Khouri, et al.,
Defendants.

_____ /

AFFIDAVIT OF CLYDE D. EDWARDS

I, Clyde D. Edwards, being first duly sworn, depose and state as follows:

1. I am currently employed by the City of Flint (the "City") as its City Administrator, a position I have held since approximately November, 2019.
2. I am currently serving as the Acting Director of the Department of Public Works, a position I have held since March 18, 2023.
3. In my role as City Administrator and Acting Director of the Department of Public Works, I regularly receive verbal and written updates and reports on the status of the City's lead service line replacement program, which includes property owner and resident outreach activities, service line excavations, service line replacements and restoration of affected properties.
4. I am aware that Plaintiffs in this litigation have filed a Motion for Contempt as to the City and the non-party Mayor Sheldon Neeley (in his official capacity) contending that the City has failed to:
 - a. Determine, by May 1, 2023, which City homes have remaining property restoration work;
 - b. Provide timely, accurate, and complete monthly restoration reporting; and

- c. Conduct mail and in-person outreach to residents to attempt to obtain their permission to conduct service line excavations (and where appropriate, replacement).
- 5. On June 21, 2023, I was informed by the City's project manager, Rowe Professional Services Company ("Rowe") that all in-person visual inspections of properties within the City where a known, confirmed contemporaneous record of restoration did not exist, had been completed. I was informed that these in-person visual inspections complied with the visual inspection criteria that were enumerated in the February 24, 2023 Order Granting Plaintiffs' Fifth Motion to Enforce Settlement Agreement. The total number of such inspections was 26,679.
- 6. On June 22, 2023, I received from Rowe a spreadsheet containing the following:
 - a. A list of all addresses within the City where an in-person visual inspection indicated that restoration was complete, containing 22,478 addresses (**Exhibit 1**);
 - b. A list of all addresses within the City where an in-person visual inspection indicated that restoration of some type was still required, containing 4,201 addresses (**Exhibit 2**);
 - c. A list of all addresses within the City where service line excavation (and where required, replacement) had been completed during the current phase of work, and restoration of some type was still required, containing 805 addresses (**Exhibit 3**);
 - d. A list of all addresses within the City where restoration had been completed during the current phase of work, containing 545 addresses (**Exhibit 4**).

7. Rowe has informed me that there are no remaining addresses left in the City at which an in-person visual inspection must be conducted (due to no contemporaneous record of restoration).
8. On June 22, 2023, I received a spreadsheet from the City's excavation, replacement and restoration contractor, Lakeshore Global Corporation ("LGC"), indicating that all in-person outreach to residents that Plaintiffs alleged was incomplete or missing, has now been completed.
9. A copy of that spreadsheet, indicating dates and times of in-person outreach, is attached as **Exhibit 5**.
10. I have been informed that the mail outreach to residents that Plaintiffs alleged was incomplete or missing has now been completed by City employees (on June 14, 2023 or June 16, 2023). **Exhibit 6**.
11. I instructed that all of the above reports (in their original Excel format) be provided to counsel for Plaintiffs.
12. I am personally familiar with these facts and statements.

A handwritten signature in black ink, appearing to read "Clyde D. Edwards", written over a horizontal line.

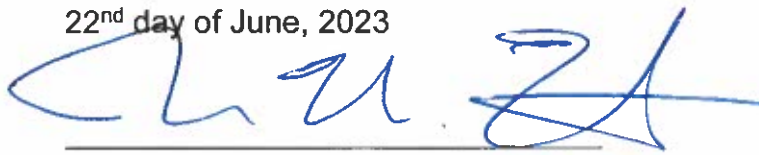
Clyde D. Edwards, in his capacity as:

City Administrator and Acting Director of
the Department of Public Works for the
City of Flint, Michigan

Date: June 22, 2023

Subscribed and Sworn before me this:

22nd day of June, 2023

A handwritten signature in blue ink, appearing to read 'J. N. Kuptz', is written over a horizontal line.

Joseph N. Kuptz, Notary Public

Genesee County, Michigan (Acting in Genesee County)

My commission expires: November 6, 2026